

EXHIBIT 2

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

STEFFON BARBER, an)
individual,)
)
Plaintiff,)
)
vs.) Case No.
) 5:22-cv-00625-KK-SHK

COUNTY OF SAN BERNARDINO,)
a municipal entity, and)
DOES 1 THROUGH 10,)
inclusive,)
)
Defendant.)
_____)

REMOTE DEPOSITION OF
STEFFON TODD BARBER
APPEARING REMOTELY VIA ZOOM
SEPTEMBER 9, 2025

Reported by:
F. ELOIS DUNCAN
CSR NO. 4066
Job No. 13309719

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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8 COUNTY OF SAN BERNARDINO,)
a municipal entity, and)
9 DOES 1 THROUGH 10,)
inclusive,)
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Defendant.)
11 _____)

12
13
14 DEPOSITION OF STEFFON TODD BARBER, taken remotely on
15 behalf of Defense beginning at 9:05 a.m. and ending at
16 10:45 a.m. on September 9, 2025, before F. Elois Duncan,
17 Certified Shorthand Reporter No. 4066, CSR.
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1 REMOTE APPEARANCES:

2
3 For Plaintiff: STEFFON TODD BARBER

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9 For Defendant: COUNTY OF SAN BERNARDINO

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14 ALSO PRESENT: OLIVER CALDERON, Videographer
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1 don't know each other. We haven't been -- like that, but
2 it seemed that type of environment. Anyway, I don't know.

9:45AM

3 Q Okay.

4 Did they give you a ride?

5 A No.

9:45AM

6 Q And eventually they did move their vehicle out
7 of the driveway; is that correct?

8 A Yeah. Yes, they did eventually move it.

9 Q Okay.

10 After they moved their vehicle out of the
11 driveway, did you drive your vehicle to the corner store?

9:45AM

12 A I never made it out to the corner store.
13 Another police came and instructed me not to get in the
14 car. Couldn't see where it was coming from and, um, I
15 jumped in the car anyway. Attempted to go in the store
16 and ended up in the hospital. I later found out that that
17 whole interactions, what I thought was my neighbor, the
18 person I didn't see was actually Deputy Christopher
19 Alfred.

9:45AM

20 Q Okay.

9:46AM

21 Let me go back to the contact with the
22 neighbors. Before you had this interaction with the
23 neighbors while they're in their vehicle, did you take
24 anything, any type of illicit substance or drink any
25 alcohol?

9:46AM

1 A Did I see what?

10:04AM

2 Q Did you see a man in your driveway at any time
3 prior to getting into your vehicle?

4 A Again, the only one I had contact with was
5 Joseph, the landlord or husband, I believe.

10:04AM

6 Q After they left in their vehicle, did you see a
7 man in your driveway at any time prior to getting into
8 your vehicle?

9 A No.

10 Q Okay.

10:04AM

11 Do you recall talking to anybody in your
12 driveway between --

13 A Yeah.

14 Q Hold on. Let me finish my question.

15 -- between your contact with Joseph and Maria
16 and getting into your vehicle?

10:04AM

17 A Yes, there was a voice. I do remember there was
18 a voice. I remember having discourse with the voice. But
19 as far as seeing the person, the voice was -- no, I don't.
20 The voice of the person that I was having this discourse
21 with, I never seen him.

10:05AM

22 Q Okay.

23 So it's your testimony that you didn't see a man
24 or anybody in your driveway prior to getting into your
25 vehicle after your contact with the neighbors?

10:05AM

1 A Yes, ma'am.

10:05AM

2 Q Okay.

3 Did you tell this individual to show you his
4 hand?

5 A Yes.

10:05AM

6 Q Why did you tell an individual that you couldn't
7 see to show you his hand?

8 A I don't recall. I couldn't see him.

9 Q Okay.

10 And it's your testimony that you didn't see a
11 flashlight at all; correct?

10:05AM

12 A That's my testimony.

13 Q Okay.

14 Did you hear the deputy give you commands to not
15 get into your vehicle?

10:06AM

16 A Yeah, I heard those commands, but I didn't know
17 who it was.

18 Q Okay.

19 Have you ever been -- before this incident, had
20 you ever been robbed?

10:06AM

21 A I mean, this is not something I want to talk
22 about.

23 THE REPORTER: It's not something I want to talk
24 about?

25 THE WITNESS: Yes.

10:06AM

1 THE REPORTER: You talk and you move your head. 10:06AM

2 BY MS. ANDERSEN:

3 Q Okay.

4 Well, during any -- if you were ever robbed
5 prior to this incident, did that individual tell you not 10:06AM
6 to get into your vehicle?

7 A No.

8 Q How long is that driveway from, let's say the
9 front of your house all the way to the street?

10 MR. DIGGS: Calls for speculation. 10:07AM

11 But you can answer.

12 THE WITNESS: Um -- I think the estimates that they
13 made that day were around 40 feet. I'm not sure.

14 BY MS. ANDERSEN:

15 Q Other than the deputy telling you to not get 10:07AM
16 into the vehicle, did you hear him say anything else to
17 you before you got in the vehicle?

18 A No.

19 Q Prior to getting into your vehicle, did you hear
20 the deputy say, "Don't reach into your vehicle"? 10:07AM

21 MR. DIGGS: Objection; that assumes facts not in
22 evidence and it lacks foundation based on prior responses.

23 But you can answer.

24 THE WITNESS: Yeah.

25 And I intentionally reached in my vehicle to see 10:08AM

1 if he was talking to me, and nothing happened, so I

10:08AM

2 figured he wasn't talking to me. The voice was at a

3 distance. I do remember that.

4 BY MS. ANDERSEN:

5 Q Okay.

10:08AM

6 What were you reaching for when he told you not
7 to reach?

8 A I think my cell phone was on my seat.

9 Q Okay.

10 What -- if you were trying to figure out who he
11 was talking to, what do you recall him saying prior to him
12 saying, "Don't reach into your vehicle," or words to that
13 effect?

10:08AM

14 A I don't recall.

15 Q Did you hear him say anything to the effect of,
16 "Hey, come talk to me," anything like that?

10:08AM

17 A No. I mean, I heard all that in trial, but as
18 far as asking me, do I remember all that, I don't.

19 Q Okay.

20 When you reached into your vehicle, did you grab
21 your cell phone?

10:09AM

22 A I believe I did --

23 Q Okay.

24 A -- I recall correctly.

25 Q And then after you grabbed your cell phone, did

10:09AM

1 A I said it sure was. It was idling.

10:10AM

2 Q Okay.

3 A Yes.

4 Q And then did you put it in reverse once you
5 closed your door?

10:10AM

6 A I don't recall. I must have. I must have
7 because the car rolled backwards --

8 Q Okay.

9 A -- once I was out of the car. But I don't
10 recall putting it in reverse.

10:10AM

11 Q Okay.

12 So you say -- but you do recall the car moving
13 backwards?

14 A Yes, from -- from -- from trial, that's what. I
15 don't recall.

10:11AM

16 MR. DIGGS: Only --

17 THE WITNESS: The person, I don't recall.

18 (Simultaneously speaking, unreportable.)

19 BY MS. ANDERSEN:

20 Q Your counsel -- I think I know what he was going
21 to say.

10:11AM

22 You can correct me if I'm wrong.

23 So I'm not looking for what you learned at trial
24 or anything like that. I'm asking for your recollection,
25 Mr. Barber. If you don't recall something, I don't really

10:11AM

1 want you guessing or telling me stuff you heard at trial 10:11AM
2 that you didn't know at the time or didn't hear at the
3 time. Does that make sense?

4 A I apologize.

5 Q That's okay. 10:11AM

6 Mr. Diggs, is that correct?

7 MR. DIGGS: That's correct. Thank you, Counsel.

8 MS. ANDERSEN: Of course. Thank you.

9 Madam Court Reporter, do you need him to repeat
10 something? I'm sorry. 10:11AM

11 THE REPORTER: I don't think so. Thank you.

12 BY MS. ANDERSEN:

13 Q So is it your testimony that at the time you got
14 into the driver's seat, you still had not seen this man in
15 your driveway, Mr. Barber? 10:11AM

16 A No.

17 Q And you do not recall whether you put it in
18 reverse or not; is that correct?

19 A That's correct.

20 Q But you do have a recollection of the car moving 10:12AM
21 backwards; is that correct?

22 A Yes.

23 MR. DIGGS: Misstates the witness's testimony.

24 BY MS. ANDERSEN:

25 Q Was that yes? I'm sorry. 10:12AM

1 A Yes.

10:12AM

2 Q Okay.

3 Do you recall pressing down on the gas pedal at
4 any time you got into the driver's seat?

5 A I don't recall.

10:12AM

6 Q Okay.

7 Were you looking at the odometer or speedometer
8 or anything like that at the time you got into the
9 driver's seat when your car started rolling backwards?

10 A I don't recall those -- those little details of
11 the incident.

10:12AM

12 Q Okay.

13 So is it your recollection that the car was in
14 park the whole time and you're just not sure how it moved
15 backwards?

10:13AM

16 A I really don't recall.

17 Q Okay.

18 Do you recall shifting gears at any time while
19 you were in the driver's seat?

20 A I don't recall.

10:13AM

21 Q Okay.

22 Once you got into the driver's seat, did you
23 hear any other words from the deputy?

24 A No.

25 Q Okay.

10:13AM

REPORTER'S CERTIFICATION

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I, F. ELOIS DUNCAN, a Certified Shorthand Reporter
of the State of California, do hereby certify:

That prior to being examined, the witness named in
the foregoing deposition solemnly stated to testify to the
truth, the whole truth and nothing but the truth;

That the said deposition was taken down by me
remotely in stenotype at the time and place therein stated
and thereafter reduced to typewriting under my direction,
and that the deposition transcript is a true and correct
record of the proceedings here held.

I further certify that I am not counsel or attorney
for any of the parties hereto or in any way interested in
the event of this cause and that I am not related to any
of the parties thereto.

Dated this 19th day of September, 2025.



F. ELOIS DUNCAN
Certified Shorthand Reporter
License No. 4066